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*Jorge Cervantes and CEC Industries, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

VANGUARD DEALER SERVICES, LLC  
and MOTOR DEALER SERVICES GROUP,  
LLC,

Plaintiffs,

v.

JORGE CERVANTES, CEC INDUSTRIES,  
INC. d/b/a DEALERS DIRECT SYSTEMS  
and/or DEALERS DIRECT  
CONSULTANTS,

Defendants.

JORGE CERVANTES, CEC INDUSTRIES  
INC. d/b/a DEALERS DIRECT SYSTEMS  
and/or DEALERS DIRECT  
CONSULTANTS,

Counterclaimants,

v.

VANGUARD DEALER SERVICES, LLC  
and MOTOR DEALER SERVICES GROUP,  
LLC,

Counter-Defendants.

Case No. 2:21-cv-01121-JAD-EJY

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
DEFENDANTS TO FILE A RESPONSE  
TO PLAINTIFFS' MOTION TO  
DISMISS COUNTERCLAIM AND  
MOTION TO STRIKE AFFIRMATIVE  
DEFENSES**

1 Plaintiffs/Counter-Defendants Vanguard Dealer Services, LLC and Motor Dealer  
 2 Services Group, LLC (together, "Plaintiffs") and Defendants/Counterclaimants Jorge Cervantes  
 3 and CEC Industries, Inc. (together, "Defendants") (collectively, the "Parties"), by and through  
 4 their undersigned counsel of record, hereby stipulate and agree to the following:

5 1. On August 29, 2022, Defendants filed an Answer to Plaintiffs' Second Amended  
 6 Complaint and Counterclaim (the "Counterclaim"). (ECF No. 59.)

7 2. On October 6, 2022, Plaintiffs filed a Motion to Dismiss the Counterclaim and a  
 8 Motion to Strike Affirmative Defenses (the "Motion to Dismiss and Strike").<sup>1</sup> (ECF Nos. 62-63.)

9 3. The deadline for Defendants' Response to Plaintiffs' Motion to Dismiss and Strike  
 10 is currently Thursday, October 20, 2022.

11 4. Counsel for Defendants are in the process of conferring with their client regarding  
 12 their Response to Plaintiffs' Motion to Dismiss and Strike. As such, the Parties hereby stipulate  
 13 and agree that the deadline for Defendants' Response shall be extended by two (2) weeks, up to  
 14 and including Thursday, November 3, 2022.

15 DATED this 18th day of October, 2022.

DATED this 18th day of October, 2022.

16 SEMENZA KIRCHER RICKARD

AKERMAN LLP

17 /s/ Katie L. Cannata

17 /s/ Scott R. Lachman

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Attorneys for Plaintiffs/Counter-Defendants

21 Attorneys for Defendants/Counterclaimants

Vanguard Dealer Services, LLC and Motor

22 Jorge Cervantes and CEC Industries, Inc.

Dealer Services Group, LLC

23 **IT IS SO ORDERED.**

24 Dated this 20th day of October, 2022.

25  
 26   
 United States District Judge

27  
 28 <sup>1</sup> Plaintiffs were provided with a two-week extension to file a responsive pleading to Defendants' Counterclaim.